KOBRE & KIM LLP

800 THIRD AVENUE
NEW YORK, NEW YORK 10022
WWW.KOBREKIM.COM

TEL +1 212 488 1200 FAX +1 212 488 1220 NEW YORK
LONDON
HONG KONG
WASHINGTON DC
SAN FRANCISCO
MIAMI
CAYMAN ISLANDS
BVI

August 14, 2015

BY ECF

The Honorable Lorna G. Schofield United States District Judge Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10007

Re: International Mineral Resources B.V. v. Scott Horton, 1:15-mc-00244

Dear Judge Schofield:

We represent applicant International Mineral Resources B.V. ("IMR") in the above-captioned matter. We write to correct an error in our earlier submissions. Specifically, IMR previously stated that "[p]ublic records indicate that [the respondent] [Scott] Horton's current address is: 230 East 71st Street, New York, NY 10021-5139." ECF No. 2, at 3, 15; see also ECF No. 3 ¶ 7, and Ex. E. Since filing its submissions, IMR has learned that the address it provided is not associated with the respondent, but rather is the address of a different person who also is named Scott Horton. Public records indicate that the respondent's current address is: 96 Witherbee Avenue, Pelham, New York 10803-2528.

The respondent's corrected address is located within the Southern District of New York. Because the respondent is still "found" within the district for purposes of 28 U.S.C. § 1782(a), we respectfully submit that this correction has no impact on the relief the Court previously granted, but we wanted to correct the record nonetheless.

Respectfully submitted,

Rebecca G. Mangold +1 212 488 1200